

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

PANTELOS CHRYSAFIS, BETTY COHEN,  
BRANDIE LACASSE, MUDAN SHI, AND  
FENG ZHOU,

*Plaintiffs,*

-against-

LETTITIA JAMES, in her official capacity as Attorney  
General of the State of New York,

*Defendant.*

2:21-cv-00998  
(SJF/ARL)

**DECLARATION OF  
HELENA LYNCH**

HELENA LYNCH, an attorney duly admitted to practice before this Court, declares, under penalty of perjury:

1. I am an Assistant Attorney General in the Office of Letitia James, Attorney General of the State of New York.

2. I have been assigned to represent Defendant, Letitia James, in her official capacity as Attorney General of the State of New York, in this matter, and I am familiar with the facts and circumstances herein.

3. I submit this declaration for the limited purpose of submitting to the Court the exhibits described below.

4. Annexed hereto as **Exhibit 1** is a true and correct copy of the form Notice of Nonpayment Petition, Civil Court of the City of New York.

5. Annexed hereto as **Exhibit 2** is a true and correct copy of the form Notice of Holdover Petition, Civil Court of the City of New York.

6. Annexed hereto as **Exhibit 3** is a true and correct copy of the text of Chapter 127 of the Laws of 2020, The Tenant Safe Harbor Act, referred to the accompanying memorandum of law as the “TSHA.”

7. Annexed hereto as **Exhibit 4** is a true and correct copy of the Legislative Information for Ch. 381 of the Laws of 2020, including the Senate Sponsor’s memorandum and the text of the Covid-19 Emergency Eviction and Foreclosure Protection Act, which is referred to in the accompanying memorandum of law as Act “CEEFPFA.”

8. Annexed hereto as **Exhibit 5** is a true and correct copy of a preprint version of the following research paper: Leifheit KM, *et al. Expiring Eviction Moratoriums and COVID-19 Incidence and Mortality* (2020). This is available at <https://ssrn.com/abstract=3739596>. The graph cited on page 7 of the accompanying memorandum of law, showing the cases prevented and lives saved by eviction moratoriums, available at [https://drive.google.com/file/d/1x8qezy\\_mXiaw7eKsU\\_D9zQnQYY0YMfgP/view?usp=sharing](https://drive.google.com/file/d/1x8qezy_mXiaw7eKsU_D9zQnQYY0YMfgP/view?usp=sharing), accompanies this article and, upon information and belief, will be included in a later version.

9. Annexed hereto as **Exhibit 6** is a true and correct copy of the following research paper: Jowers, Kay *et al., Housing Precarity and the COVID-19 Pandemic* (2021).

10. Annexed hereto as **Exhibit 7** is a true and correct copy of the form Hardship Declaration, which is available in approximately twenty languages on the Office of Court Administration website. See <http://www.nycourts.gov/courts/nyc/civil/CORONA/covid-eefpa.shtml>.

11. Annexed hereto as **Exhibit 8** is a true and correct copy of the Legislative Information for Senate Bill 5357 / Assembly Bill 5967, which was delivered to the Governor on March 5, 2021.

Dated: Mineola, New York  
March 8, 2021

/ Helena Lynch  
Helena Lynch  
Assistant Attorney General, *of Counsel*  
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